

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

NO. 3:19-CR-262-N

SHON GREENWOOD

FACTUAL RESUME

In support of Shon Greenwood's plea of guilty to the offenses in Counts One and Two of the indictment, Greenwood, the defendant, Gabriela Vega, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offenses alleged in Counts One and Two of the indictment, charging a violation of 18 U.S.C. § 2251(a), that is, Production of Child Pornography, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant used, persuaded, enticed or coerced a minor to engage in sexually explicit conduct;
- Second.* That the defendant acted with the purpose of producing a visual depiction of such conduct; and
- Third.* That the visual depiction was produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce, including by computer.

¹ Fifth Circuit Pattern Jury Instruction 2.84 (5th Cir. 2015).

STIPULATED FACTS

1. Greenwood admits and agrees that on or about December 16, 2018, in the Dallas Division of the Northern District of Texas, he did knowingly use, persuade, induce, and entice a minor, Jane Doe #1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant used his cell phone to create a visual depiction of Jane Doe, a minor who was then 9-years-old, depicting Shon Greenwood penetrating the mouth of Jane Doe with his penis.

2. Greenwood admits and agrees that on or about December 16, 2018, in the Dallas Division of the Northern District of Texas that he and Dawn Greenwood used, persuaded, induced, and enticed, a minor Jane Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, Dawn Greenwood and Shon Greenwood, used a cell phone to create a visual depiction of Jane Doe, a minor who was then 9-years-old, depicting Dawn Greenwood pushing Jane Doe's head down on Shon Greenwood's penis.

3. Specifically, the Dallas Police Department received information from the Boone County, Missouri Sheriff's Office that they had received a Cybertip from the

National Center for Missing and Exploited Children that an individual had distributed child pornography using Facebook. The sheriff viewed the video and found that it contained child pornography. Facebook indicated that the person who posted and distributed the child pornography was Shon Greenwood. The sheriff was able to determine that the IP address belonged to Shon Greenwood in Missouri.

4. Based on the information from Facebook and further investigation, the Boone County Sheriff's Office executed a search warrant where the Greenwoods were thought to reside on January 11, 2019. Upon talking to neighbors, the deputies learned that Shon had lived at the residence with his wife, Dawn Greenwood, Jane Doe (9-years-old) and another minor female. Shon had moved to Balch Springs, Texas in October 2018, and Dawn had joined her husband in mid-December 2018. Shon's step-father and neighbors identified the girl depicted in one of the child pornography ~~videos~~ ^{images S.G. mbv} that Shon had distributed on Facebook as Jane Doe. A blanket was located at the home in Missouri that matched the blanket in the ~~video~~ ^{image S.G. mbv}.

5. Based on the information received from the Boone County Sheriff's Office, the Dallas Police Department executed a search warrant at the Greenwood's Balch Springs residence which is located in the Northern District of Texas. The Greenwoods were both present during the execution of the search warrant, as well as the two minors, including Jane Doe. The police seized the Greenwoods' cell phones. The phones were forensically examined, and they found child pornography as defined in 18 U.S.C. § 2256, including the videos described in Counts One and Two of the indictment Shon Greenwood's phone. In the first video, Shon is penetrating the mouth of Jane Doe with his penis. In the

second video, Dawn placed Jane Doe's mouth on Shon's penis and encouraged her to give him oral sex. The police recognized the room that the video was filmed as a room in the Balch Springs residence. While the videos were produced on the same day, the first was several hours before the second, and only depicted Shon and Jane Doe. Dawn agreed to speak with the detectives, and she admitted that she took part in the production of the video depicting Shon penetrating Jane Doe's mouth with his penis.

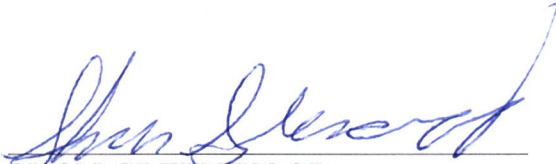
6. Shon Greenwood admits that the videos he produced, including the video he made with Dawn Greenwood and Jane Doe, as described in Counts One and Two, depict sexually explicit conduct and the lewd and lascivious genitals of a minor girl as defined in 18 U.S.C. § 2256. Greenwood acknowledges that he knowingly produced and participated in the videos described in Counts One and Two, knowing that the child depicted was a nine-year-old girl. He agrees and stipulates that the visual depictions of the lewd and lascivious exhibition of the genitals and sexually explicit conduct involving Jane Doe were produced using a cell phone manufactured outside the State of Texas. He further stipulates that the production of the video occurred in the Northern District of Texas. ~~Greenwood further agrees and stipulates that all of his conduct involving the production of child pornography shall be taken into account in the guidelines, and is not limited to the conduct charged in Counts One and Two.~~ S G MGO

7. The defendant agrees that the defendant committed all the essential elements of the offenses. This factual resume is not intended to be a complete accounting of all the facts and events related to the offenses charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's

guilty plea to Counts One and Two of the indictment.

AGREED TO AND STIPULATED on this 21st day of November, 2019.

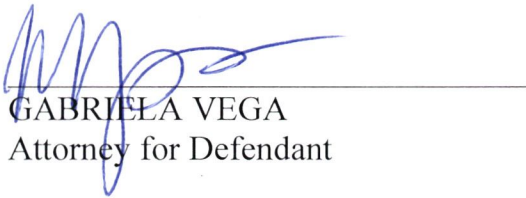
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